

Illinois Commerce Commission**Pipeline Safety****Pipeline Safety Report****Inspection #: 2015-P-00361**

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Exit Meeting Contact: John Bozarth	Total Man Days: 1.5
Pipeline Safety Representative(s): Valerie Schwing	
Company Representative to Receive Report: Michael Fuller	<u>Emailed Date:</u>
Company Representative's Email Address: mfuller2@ameren.com	10/27/2015

Inspection Summary

Inspection Type	Location	ICC Analyst	Inspection Unit(s)	Man Day(s)	Inspection Date(s)	Contact(s)
Compliance Follow-Up	Pawnee	Valerie Schwing	Alton	1.5	10/9/2015 (Half), 8/28/2015	John Bozarth

Statement of Activities

On August 28, 2015, Staff conducted a Compliance Follow-Up audit for Ameren Illinois ("Ameren") operating center Alton. The audit was conducted to determine compliance with applicable IL Adm. Codes and the Code of Federal Regulations adopted via IL Adm. Part 590. The audit was conducted in order to close the outstanding Notice of Probable Violations ("NOPV's") 2013-V001-00019 through 2013-V018-00019.

The alleged violations are detailed in a Staff Report dated September 5, 2013, signed by Darin R. Burk, Pipeline Safety Program Manager, Safety and Reliability Division of the Illinois Commerce Commission filed on October 2, 2013 ("Staff Report"). The alleged violations relate to two audits involving Ameren's Alton operating center. The NOPV's 2013-V001-00019 through 2013-V018-00019 indicated incidents of improper leak classification would, if proven, violate Ameren's guidelines for leak classification in its Operation and Maintenance Plan with reference to 49 Code of Federal Regulation §192.605(a).

The Joint Motion in Docket # 13-0554 stated the Parties engaged in negotiations reach a settlement of this proceeding without regard to liability. As a result of these negotiations, Ameren and Staff reached terms of a settlement in the form of the Stipulation. The Stipulation provided the terms of the settlement found on the Final Order of Docket # 13-0554.

During the Compliance Follow-Up audit conducted on August 28, 2015, Staff gathered and reviewed information at the Ameren Pawnee Training Center in order to validate that all the terms have been fulfilled by Ameren. The audit summarizes the Stipulations (a-f) and how the combined Compliance Follow-Up audits conducted on July 8, 2014, and August 28, 2015, validated the completion of the Stipulations by Ameren.

On October 9, 2015, Staff conducted an exit meeting to discuss and confirm the audit findings. The details of the exit meeting can be found on the "Exit Meeting Form" in the attached documents.

Exit Statement

N/A

INSPECTION FINDINGS**Compliance Follow-Up****Issues(s) Found:**

[NO ISSUES FOUND]

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Notice Of Amendment(s) Found:

[NO NOAS FOUND]

Notice Of Violation(s) Found:

[NO NOPVS FOUND]

PAST INSPECTION FINDINGS

Issue(s) Corrected:

[NO ISSUES CORRECTED]

Notice Of Amendment(s) Corrected:

[NO NOAS CORRECTED]

Notice of Violations(s) Corrected:

2013-V001-00019 (Code Part [192.605(a)]) - - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak

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Case Field Reports” in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual (“O&M”) Leak 2.04 subsection 9 which states, “Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year.” Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V002-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois (“Ameren”) has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. “Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission’s Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois’ “Insight” learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for “Leak Case Field Reports” in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for “Leak Case Field Reports” in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan

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procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V003-00019 (Code Part [192.605(a)]) - - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August

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28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V004-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the

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repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V005-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. 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2013-V006-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois (“Ameren”) has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. “Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission’s Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. 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The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual (“O&M”) Leak 2.04 subsection 9 which states, “Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year.” Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-

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V018-00019 can be closed.

2013-V007-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

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2013-V008-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V009-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has

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satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V010-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations

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outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V011-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois

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will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V012-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor

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who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V013-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional

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full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V014-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois

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will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V015-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor

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who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V016-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional

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full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V017-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-

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0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed. e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

2013-V018-00019 (Code Part [192.605(a)]) - On August 28, 2015, Staff has determined that Ameren Illinois ("Ameren") has satisfied all terms of the settlement stipulated under docket number 13-0554. The Final Order dictated that: Item a. "Ameren

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Illinois will pay a penalty under Section 7 of the Gas Pipeline Safety Act, of Thirty-Five Thousand (\$35,000.00) dollars within thirty (30) days after a Commission's Final Order approving the Stipulation. This amount represents the penalty for the violations outlined in the Order initiating the docket and as reflected in the Staff Report; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has indeed completed section 10(a) of docket number 13-0554 and paid the \$35,000.00 penalty. Item b. To strengthen the training and qualification of employees performing leak management activities, Ameren Illinois will change the requalification interval for leak management covered tasks. This interval will transition from the current three year interval to an annual interval, beginning in 2014; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(b) of docket number 13-0554 by implementing annual refresher training. Staff met with the new Ameren Training Supervisor who conducts the refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item c. Ameren Illinois will hire one additional full time employee to support the additional operator qualification evaluations of gas field personnel performing leak management covered tasks, within 120 days of Commission approval of the Stipulation; should the hiring be delayed for any reason, Ameren Illinois will notify Staff; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(c) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Item d. Ameren Illinois will implement annual refresher training to all necessary gas employees on the Operations and Maintenance Plan leak management procedures. This classroom style training will be documented through Ameren Illinois' "Insight" learning management system; On August 28, 2015, Staff has determined that Ameren has satisfied section 10(d) of docket number 13-0554 by reviewing information provided during refresher training for the employees performing leak management activities. The refresher training is one full day and consists of an average of two employees at a time. The training includes a Power Point presentation, open discussion, a closed book exam, a field evaluation, and simulating both inside and outside leaks. Staff reviewed the classroom study material and the closed book exam. Staff has also been informed that Ameren is in the process of recreating the training leak field to include wall to wall pavement, improved leak simulations, and new buildings to investigate leak migration. Staff examined the new leak field designs and sketches. Item e. Ameren Illinois will continue to perform increased Quality Assurance reviews for "Leak Case Field Reports" in the Alton operating center through June 30, 2014; On July 8, 2014, Staff completed a Compliance Follow-Up audit and determined Ameren has done monthly Quality Assurance reviews for "Leak Case Field Reports" in the Alton operator center from July 1, 2013, through June 30, 2014, in accordance with section 10(e) of docket number 13-0554. Quality Assurance personnel assessed all the leaks reported in the previous month. Staff has reviewed the Gas Quality Assurance Records Audit Reports. Item f. Ameren Illinois will revise the Operations and Maintenance Plan procedures in the instance where multiple leak calls are received from the customer, to be completed by January 31, 2014. The revision to the Operations and Maintenance Plan will state that if Ameren Illinois is contacted by a customer three times with regard to a specific Class 3 (non-hazardous) leak, Ameren Illinois will repair the leak within a reasonable time period. On August 28, 2015, Staff has determined that Ameren has satisfied section 10(f) of docket number 13-0554 by reviewing the Operations and Maintenance Manual ("O&M") Leak 2.04 subsection 9 which states, "Multiple Public Leak Calls A. When multiple calls, three or more, are received from the public regarding a leak, the Gas Supervisor will determine the actions needed to expedite the repair of the leak and ensure that the planned repair actions are communicated to the customer, adjacent property owners or individual(s) who reported the leak. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed. B. Gas Compliance will run a monthly OAS report of Multiple Leak Calls by address and distribute to Operations to assist the Gas Supervisor in identifying where three or more leak calls have been reported within a year." Staff also reviewed randomly selected monthly OAS reports of Multiple Leak Calls. With the combined Compliance Follow-Up audits conducted on July 8, 2015, and August 28, 2015, Staff has determined that Ameren has satisfied all of the requirements stipulated under the Final Order docket number 13-0554 (a-f). Therefore, NOPVs 2013-V001-00019 through 2013-V018-00019 can be closed.

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